

James A. Krueger, WSBA #3408
Lucy R. Clifthorne, WSBA #27287
Vandenberg Johnson & Gandara, LLP
1201 Pacific Avenue, Suite 1900
Tacoma, WA 98402-4391
253-383-3791
jkrueger@vjglaw.com
lclifthorne@vjglaw.com
Counsel for Defendant

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DEBRA BROWN, individually and on behalf)
of all others similarly situated,)
)
Plaintiff,)
)
v.)
)
UNIVERSAL AUTO GROUP III, INC., D/B/A)
ENUMCLAW CHRYSLER JEEP DODGE)
RAM,)
)
Defendant.)

No. 2:21-cv-00700

NOTICE OF APPEARANCE

TO: DEBRA BROWN, Plaintiff above-named

AND TO: KIRA M. RUBEL and IGNACIO HIRALDO, Her Attorneys

AND TO: CLERK OF THE COURT

YOU, AND EACH OF YOU ARE HEREBY NOTIFIED that the undersigned JAMES A. KRUEGER and LUCY R. CLIFTHORNE, of VANDEBERG JOHNSON & GANDARA, LLP, do hereby make their appearance for and on behalf of Defendant UNIVERSAL AUTO GROUP III, INC., D/B/A ENUMCLAW CHRYSLER JEEP DODGE RAM. This appearance is made without waiving any objection to:

1. Lack of jurisdiction over the subject matter;

NOTICE OF APPEARANCE - 1
Case No. 2:21-cv-00700

VANDEBERG JOHNSON & GANDARA, LLP
ATTORNEYS AT LAW
1201 PACIFIC AVENUE, SUITE 1900
P.O. BOX 1315
TACOMA, WASHINGTON 98401-1315
(253) 383-3791 (TACOMA)
FACSIMILE (253) 383-6377

2. Lack of jurisdiction over the person;
3. Improper venue;
4. Insufficiency of process;
5. Insufficiency of service of process;
6. Failure to state a claim upon which relief may be granted; and
7. Failure to join a party under Rule 19.

You are hereby further notified that all further papers and pleadings in the above-entitled matter except original process be served upon them at the address below stated.

DATED this 10th day of June, 2021.

VANDEBERG JOHNSON & GANDARA, LLP

By /s/ James A. Krueger
James A. Krueger, WSBA # 3408

VANDEBERG JOHNSON & GANDARA, LLP

By /s/ Lucy R. Clifthorne
Lucy R. Clifthorne, WSBA # 27287

Attorneys for Defendant

Vandenberg Johnson & Gandara, LLP
1201 Pacific Avenue, Suite 1900
Tacoma, WA 98402-4391
253-383-3791
jkrueger@vjglaw.com
lclifthorne@vjglaw.com

NOTICE OF APPEARANCE - 2
Case No. 2:21-cv-00700

VANDEBERG JOHNSON & GANDARA, LLP
ATTORNEYS AT LAW
1201 PACIFIC AVENUE, SUITE 1900
P.O. BOX 1315
TACOMA, WASHINGTON 98401-1315
(253) 383-3791 (TACOMA)
FACSIMILE (253) 383-6377